

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: **PAUL HRYWNAK**, aka Paul Hrywnak, Jr., : **Chapter 13**
Debtor, : Case No. **5:19-bk-04435**

DEUTSCHE BANK NATIONAL TRUST COMPANY, as :
Trustee, in trust for registered Holders of Long :
Beach Mortgage Loan Trust 2005-WL2, Asset- :
Backed Certificates, Series 2005-WL2 :
Movant, : **Motion for**
v. : **Relief from Stay**
PAUL HRYWNAK, aka Paul Hrywnak, Jr., and :
Charles J. DeHart, III, Chapter 13 Trustee, :
Respondent, :

ANSWER TO MOTION OF DEUTSCHE BANK FOR RELIEF FROM STAY

AND NOW COMES Debtor(s) **PAUL HRYWNAK**, by and through their attorneys, FISHER CHRISTMAN, and in Answer to the Motion of **DEUTSCHE BANK** for Relief from Stay aver:

1. Admitted.
2. Denied. The property is 514 O'Hara Road, Moscow, Lackawanna County, Pennsylvania. Debtor's residence occupies the subject property in part, and an adjacent property.
3. Denied. The Trustee is a Standing Trustee by authority of the Office of United States Trustee.
4. Denied to the extent the document(s) referenced do not speak for itself/themselves.
5. Denied. Debtor lacks sufficient information and belief as to the identity of the holder of the mortgage secured by a portion of his residence, and such is therefore Denied.
6. Admitted.

7. Admitted in part and Denied in part. Debtor has undergone debilitating medical treatment since filing and has only recently begun to recover. Debtor seeks a mortgage modification, and is in the process of gathering documentation and preparing income documentation to support of mortgage modification application. Debtor anticipates making a partial mortgage payment in advance of any hearing on the instant Motion, and making payment thereafter consistent with the Court's mortgage modification program.

8. Admitted in part and Denied in part. See response to paragraph 7, above.

9. Admitted in part and Denied in part. See response to paragraph 7, above.

10. Denied to the extent the averments of paragraph 10 constitute other than a statement or conclusion of law or misplaced request for relief. See response to paragraphs 2, 5 and 7, above. Further, as Debtor's residence, the property is necessary for an effective reorganization.

11. Denied to the extent the averments of paragraph 11 constitute other than a statement or conclusion of law or misplaced request for relief.

WHEREFORE, Debtor **PAUL HRYWNAK** respectfully prays this Honorable Court for an Order than the Motion of **DEUTSCHE BANK** for Relief from Stay be Denied, or in the alternative for entry of an adequate protection order conditioning the automatic stay on future payments sufficient to provide adequate protection, and for such other and further relief as the Honorable Court deems just and appropriate.

Respectfully Submitted,
FISHER & CHRISTMAN

By: /s/ J. Zac Christman
J. Zac Christman, Esquire
Attorney for Debtor(s)
530 Main Street
Stroudsburg, PA 18360
(570) 234-3960, fax: (570) 234-3965
zac@fisherchristman.com